## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF DELAWARE

THOMSON REUTERS ENTERPRISE	)
CENTRE GMBH and WEST PUBLISHING	)
CORPORATION,	)
	) C.A. No. 20-613-SB
Plaintiffs/Counterdefendants,	)
	) JURY TRIAL DEMANDED
V.	)
	)
ROSS INTELLIGENCE INC.,	)
	)
Defendant/Counterclaimant.	)

## DEFENDANT/COUNTERCLAIMANT'S MOTION AND PROPOSED ORDER GRANTING LIMITED EXEMPTION FROM THE STANDING ORDER REGARDING PERSONAL ELECTRONIC DEVICES

Defendant/Counterclaimant ROSS Intelligence, Inc. respectfully requests an exemption from the Court's May 15, 2023 Standing Order entitled *In re: Procedures Regarding the Possession and Use of Cameras and Personal Devices by Visitors to the J. Caleb Boggs Federal Building and United States Courthouse* so that the following attorneys and trial support staff may bring their personal electronic devices, including cellular phones, smart phones, laptop computers, smart watches, and tablet computers (along with monitors, computer mice, charging devices, power cords, extension cords, USB drives, HDMI matrix, MiFi/Hotspot devices) to the August 22, 2024 courtroom set up, and trial from August 23, 2024 through August 30, 2024 in this matter:

Lead Counsel				
Warrington Parker	Keith Harrison	Joachim Steinberg	Crinesha Berry	
Ryan Seewald				

Paralegal:				
Client:				
Trial Tech from Cogent Legal:				

Expert and Fact Witnesses:				
Tomas van der Heijden	Thomas Hamilton	Jimoh Ovbiagele	Barbara Frederiksen-Cross	
Richard Leiter	Alan Cox	Joseph Marks		

The above-named individuals will continue to be bound by Federal Rule of Criminal Procedure 53 and Local Civil Rule 83.2 prohibiting photographs or broadcasting.

## OF COUNSEL:

Warrington S. Parker III
Joachim B. Steinberg
Jacob Canter
CROWELL & MORING LLP
3 Embarcadero Ctr., 26th Floor
San Francisco, CA 94111
Tel: (415) 986-2800

Crinesha B. Berry CROWELL & MORING LLP 1001 Pennsylvania Avenue NW Washington, DC 20004 Tel: (202) 624-2500

Dated: August 13, 2024 11696044 / 20516.00001

Respectfully submitted,

POTTER ANDERSON & CORROON LLP

By: /s/ David E. Moore

David E. Moore (#3983)

Bindu A. Palapura (#5370)

Andrew L. Brown (#6766)

Hercules Plaza, 6th Floor

1313 N. Market Street

Wilmington, DE 19801

Tel: (302) 984-6000

dmoore@potteranderson.com

bpalapura@potteranderson.com

abrown@potteranderson.com

Attorneys for Defendant/Counterclaimant ROSS Intelligence, Inc.

IT IS SO ORDERED this	day of	, 2024.	
	Judge		